

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re:

Tri-State Paper, Inc.,

Debtor.

Case No. 23-13237-pmm

Chapter 11

**Debtor's Application to Employ Joseph M. Grey CPA, EA  
as Debtor's Accountant**

**AND NOW**, Applicant Tri-State Paper, Inc., by and through its proposed counsel, applies to this Court for entry of an order authorizing employment of a professional in accordance with L.B.R. 2014-1. In support of this application, the Applicant states as follows:

1. The Applicant is the debtor in the above chapter 11 bankruptcy case.
2. The Applicant seeks to retain Joseph M. Grey CPA, EA, (the "Accountant") to serve as its accountant.
3. Employment of the Accountant is necessary for the Applicant to adequately perform its duties as a debtor.
4. The Accountant has been selected because it has considerable experience working as an accountant for bankrupt debtors.
5. The services to be rendered by the Accountant include but are not limited to: (a) preparing the Applicant's 2022 federal, state, and local tax returns, (b) preparing the monthly operating reports required by the bankruptcy code, and (c) providing assistance in developing a plan of reorganization.
6. Upon information and belief, the Accountant has no connection with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee.
7. Upon information and belief, the Accountant does not hold an adverse interest to the estate, does not represent an adverse interest to the estate, and does not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which they will be retained under 11 U.S.C. § 327(a).

8. A declaration by the Accountant is attached as Exhibit A.

9. The proposed arrangement for compensation is outlined in the declaration of the Accountant, which is attached as Exhibit A.

10. The Applicant respectfully requests authorization to employ the Accountant to render services in accordance with this application, with compensation to be paid as an administrative expense in such amounts as the Court may determine and allow.

**NOW, THEREFORE**, the Applicant asks this Court to grant relief in the form of order attached and to grant such other relief in its favor as may be necessary and proper under the law.

Date: October 27, 2023

CIBIK LAW, P.C.  
*Proposed Counsel for Debtor*

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